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*Counsel for Plaintiffs AAUP, AFT, UC-AFT, CNA/NNU, and UAW in AAUP v. Trump, Case No. 3:25-cv-07864-PHK*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

NEETA THAKUR, *et al.*, individually and  
on behalf of all others similarly situated,

Plaintiffs,  
v.

DONALD J. TRUMP, *et al.*,

### Defendants.

Case No. 3:25-cv-04737-RFL

Assigned to the Honorable Rita Lin

**DECLARATION OF BARBARA J.  
CHISHOLM IN SUPPORT OF  
ADMINISTRATIVE MOTION TO  
CONSIDER WHETHER CASES SHOULD  
BE RELATED (CIVIL L.R. 3-12)**

I, Barbara J. Chisholm, declare as follows:

1. I am an attorney representing Plaintiffs American Association of University Professors (AAUP), American Federation of Teachers (AFT), University Council-American Federation of Teachers (UC-AFT), International Union, United Automobile, Aerospace and Agricultural Implement Workers of America (UAW), and California Nurses Association/National Nurses United (CNA/NNU) in *AAUP, et al. v. Trump, et al.*, N.D. Cal. Case No. 3:25-cv-07864-PHK, and am a partner at the law

firm of Altshuler Berzon LLP. I am a member in good standing of the bars of the State of California and this Court. I make this declaration based on my personal knowledge and, if called to testify, could and would testify as stated herein.

2. At 12:03 p.m. on Tuesday, September 16, 2025, I contacted the U.S. Attorney for the Northern District of California, Craig Missakian, copying Civil Chief Pamela Johann, to ask Mr. Missakian if he would accept service of the complaint and whether he could provide defendants' position on whether the two cases should be related. Ms. Johann responded that her office could not agree to waive service without client permission and that she would be responding separately on the related case question. My colleague Stacey Leyton then asked when we could expect an answer on the related case question and Ms. Johann stated only that she would let us know when she learned anything further. At the time of this filing, Defendants have not yet provided their position. Because the rules require Plaintiffs to promptly provide the Court notice of a related case, we are proceeding to file the Administrative Motion to Consider Whether Cases Should Be Related.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed September 16, 2025, in San Francisco, California.

/s/ Barbara J. Chisholm  
Barbara J. Chisholm